



United States Department of Justice

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July 2, 2024

Via ECF

Hon. Daniel J. Stewart
United States Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 314
Albany, New York 12207

Re: *United States v. Michael Mann*, Crim. Case No. 20-CR-199 (LEK) (DJS)

Dear Judge Stewart:

The parties jointly submit the following letter advising the Court of the status of discovery, as required by the Court's Discovery Order of May 23, 2024. Doc. No. 171.

As the Court ordered, the parties have exchanged initial disclosures. The Government has disclosed over 18,000 pages of documents that it obtained from Bank of America and Bancorp during the criminal investigation of Michael Mann. These documents include bank statements that pertain to the source(s) of funds in the seized bank accounts. Counsel for the United States identified the documents that it believes are most relevant to the financial analysis. The Government has also agreed to produce the information it received from Pioneer Bank and Cachet Financial Services during the criminal investigation.

The Government issued a subpoena to Bank of America, seeking additional documents and information from Bank of America, which may be necessary to determining the source(s) of funds in at least one of the seized accounts. Doc. Nos. 175 & 177. Responsive information is due July 5, 2024, however we expect that Bank of America will require additional time to comply.

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Third-Party Claimants Cachet Financial Services and Pioneer Bank are reviewing the documents the United States produced. Cachet Financial Services expects to complete its review by August 30, 2024. Pioneer Bank expects to complete its review by the middle of September 2024. The Discovery Order provides that “[a] further discovery conference will be set approximately 60 days after the date of this Order.” Doc. No. 171. However, as the parties have only just exchanged initial disclosures, they are reviewing a document production, and have an outstanding subpoena to Bank of America, the parties respectfully suggest that the Court adjourn the discovery conference until early September.

Respectfully submitted,

**FOR THE
UNITED STATES OF AMERICA**

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Assistant U.S. Attorneys

**FOR CACHET FINANCIAL
SERVICES**

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FOR PIONEER BANK

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